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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

SOUTHERN DIVISION

LAURA HANSON,

Plaintiff,

v.

STATE OF OREGON LEGISLATIVE
 ASSEMBLY,

Defendant.

Case No. 3:21-cv-00780-SI

**DEFENDANT'S OBJECTIONS TO
 PLAINTIFF'S EXHIBITS**

Defendant Oregon Legislative Assembly objects to the proposed exhibits of plaintiff as follows:

Exhibit No.	Bates Begin	Bates End	Description	Objections
1	Hanson_Defendants_009154	Hanson_Defendants_009159	Nov. 14, 2018 Legislative Assistant Position Description	No objection (same as Exh. 235)
2	HANSON002594	HANSON002596	Dec. 5, 2018 Hire Form & Pay Letter	No objection
3			Legislative Branch Personnel Rule 27 (revised) – Effective June 29, 2019	No objection (same as Exh. 216)
4	Hanson_Defendants_000392	Hanson_Defendants_000392	Legislative Branch Personnel Rule 5A: ADA	Objection: irrelevant —

Exhibit No.	Bates Begin	Bates End	Description	Objections
				<i>there is no contention this was violated and no basis for saying there is a private right of action</i>
5	HANSON001662	HANSON001996	Text messages b/w Hanson & Gelser	No objection
6	Hanson_Defendants_069890	Hanson_Defendants_069896	Dec. 17, 2019 Memo from Hanson to Gelser	No objection
7	Hanson_Defendants_069908	Hanson_Defendants_069915	Response from Gelser to Hanson's Dec. 17, 2019 Memo	No objection
8	Hanson_Defendants_070017	Hanson_Defendants_070025	Dec. 18, 2019 Memo from Hanson to Gelser	No objection
9	Hanson_Defendants_070058	Hanson_Defendants_070060	Response from Gelser to Hanson's Dec. 18, 2019 Memo	No objection
10	Hanson_Defendants_070062	Hanson_Defendants_070064	Reply from Hanson to Gelser's Response to Dec. 18, 2019 Memo	No objection
11	Hanson_Defendants_070149	Hanson_Defendants_070152	Dec. 19, 2019 Memo from Hanson to Gelser	No objection
12	Hanson_Defendants_070175	Hanson_Defendants_070176	Response from Gelser to Hanson's Dec. 19, 2019 Memo	No objection
13	Hanson_Defendants_009162	Hanson_Defendants_009163	Christmas card from Hanson to Gelser	No objection (but prefer Exh. 234 as it is in color)
14	Hanson_Defendants_070331	Hanson_Defendants_070331	Dec. 27, 2019 Email from Hanson to Gelser	No objection
15	Hanson_Defendants_009132	Hanson_Defendants_009132	Dec. 30, 2019 Handwritten note re: panic attacks	<i>Objection: lack of foundation, hearsay</i>
16	Hanson_Defendants_009133	Hanson_Defendants_009136	Dec. 31, 2019 Handwritten notes re: Hanson	<i>Objection: lack of foundation, hearsay</i>
17	Hanson_Defendants_004044	Hanson_Defendants_004049	Jan. 2, 2020 Email Exchange b/w Hanson & Knieling	No objection (same as Exh. 269)
18	Hanson_Defendants_004050	Hanson_Defendants_004050	Jan. 2, 2020 Email from Baumgart to Knieling RE: I connected with Laura.	<i>Objection: lack of foundation, hearsay;</i>

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Exhibit No.	Bates Begin	Bates End	Description	Objections
				<i>Brenda Baumgart not being called by plaintiff</i>
19	HANSON002695	HANSON002699	Stoel Rives Bio - Brenda Baumgart	<i>Objection: lack of foundation, hearsay</i>
20	Hanson_Defendants_009170	Hanson_Defendants_009173	Jan. 2, 2020 Email Exchange b/w Knieling & Gelser	<i>Objection: as to Shane Walker component of exhibit, lack of foundation, hearsay</i>
21	Hanson_Defendants_070824	Hanson_Defendants_070825	Jan. 3, 2020 Email Exchange b/w Hanson, Mele & Knieling RE: Question about office expenses	No objection
22	Hanson_Defendants_070872	Hanson_Defendants_070873	Jan. 5, 2020 Email Exchange b/w Hanson & Knieling RE: Confused about process	No objection
23	Hanson_Defendants_004055	Hanson_Defendants_004057	Jan. 5, 2020 Email from Knieling to Baumgart Fwd: Confused about process	No objection
24	Hanson_Defendants_004062	Hanson_Defendants_004064	Jan. 6, 2020 Email from Knieling to Baumgart RE: Hanson's Memo of Admin. Leave	No objection
25	Hanson_Defendants_070945	Hanson_Defendants_070945	Jan. 6, 2020 Email from Knieling to Hanson & Gelser RE: Meeting at 11	<i>Objection: irrelevant</i>
26	Hanson_Defendants_000733	Hanson_Defendants_000734	Jan. 6, 2020 Memo to Hanson RE: Paid Admin. Leave	<i>Objection: duplicative of Exh. 24</i>
27	HANSON008864	HANSON008865	Jan. 10, 2020 Memo From Tom Powers RE: HCR 20 – Personnel Rule 27 and Complaints Against Legislators	<i>Objection: lack of foundation, hearsay</i>
28	Hanson_Defendants_000736	Hanson_Defendants_000736	Jan. 20, 2020 Hanson FMLA Certification	No objection
29	HANSON001521	HANSON001525	Jan. 27, 2020 Email from Hanson to Sandmeyer RE: Rule 27 Investigation	No objection
30	Hanson_Defendants_000956	Hanson_Defendants_000957	Jan. 29, 2020 Memo From Sandmeyer to Hanson RE: Follow-up Q&A	No objection
31	Hanson_Defendants_000809	Hanson_Defendants_000810	Jan. 15, 2020 Email from Hanson to Knieling RE: Follow up	<i>Objection: hearsay</i>

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Exhibit No.	Bates Begin	Bates End	Description	Objections
32			July 9, 2020 Email from Sandmeyer to Hanson RE: Confidential Communication-do not forward	<i>Objection: lack of foundation, hearsay, and would require the defense to call and cross-examine counsel if admitted</i>
33	Hanson_Defendants_000641	Hanson_Defendants_000642	Legislative Branch Personnel Rule 8: Americans with Disabilities Act (2020 update)	<i>Objection: irrelevant — there is no contention this was violated and no basis for saying there is a private right of action</i>
34	Hanson_Defendants_000511	Hanson_Defendants_000526	House Concurrent Resolution 221	No objection (same as Exh. 217)
35	HANSON000396	HANSON000397	Sept. 4, 2020 Email Exchange b/w Knieling & Holley RE: Laura Hanson's suspension from work	<i>Objection: irrelevant, and would require the defense to call and cross-examine counsel if admitted</i>
36	Hanson_Defendants_003633	Hanson_Defendants_003641	Oct. 6, 2020 Memo from Sen. Prozanski RE: Conduct chair agenda 10.7.2020	<i>Objection: lack of foundation, hearsay; plaintiff is not calling either Sen. Prozanski or Ms. Nordlund</i>
37	HANSON001526	HANSON001526	Oct. 7, 2020 Memo from Gelser to	No objection

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Exhibit No.	Bates Begin	Bates End	Description	Objections
			Hanson RE: Termination of Employment	(same as Exh. 225)
38			Oct. 13, 2020 BOLI Complaint	<i>Objection: irrelevant, hearsay, lack of foundation, Sleigh v. Jenny Craig Weight Loss Centres, Inc., 161 Or. App. 262 (1999)</i>
39			Dec. 29, 2020 Letter from BOLI RE: Acceptance of Complaint	<i>Objection: irrelevant, hearsay, Sleigh v. Jenny Craig Weight Loss Centres, Inc., 161 Or. App. 262 (1999)</i>
40			Oct. 16, 2020 Tort Claim Notice	<i>Objection: irrelevant, lack of foundation, hearsay, and would require the defense to call and cross-examine counsel if admitted</i>
41	HANSON006639 HANSON006649	HANSON006649 HANSON006659	Sabrina Ullmann Mathews Therapy Records and Bills	<i>Objection: the 2023 date on this exhibit makes clear it was not contemporaneous, and not actually the records or</i>

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Exhibit No.	Bates Begin	Bates End	Description	Objections
				<i>bills, but a reconstruction not satisfying Fed. R. Ev. 1006</i>
42			August 4, 2022 Declaration of Nathan Monson	<i>Objection: lack of foundation, hearsay, subject to defendant's Motion in limine No. 14</i>
43	Hanson_Defendants_000744	Hanson_Defendants_000781	Laura Hanson Workday File	<i>Objection: lack of foundation, hearsay, irrelevant</i>
44	Hanson_Defendants_075747	Hanson_Defendants_075748	Dec. 21, 2022 Email from Ye to Pham RE: Question regarding Legislative Assistant position	<i>Objection: lack of foundation, hearsay; plaintiff is not calling Mr. Ye</i>
45	Hanson_Defendants_075743	Hanson_Defendants_075743	Dec. 30, 2022 Email from Ye to Hanson RE: Laura Hanson Onboarding	<i>Objection: lack of foundation, hearsay</i>
46	HANSON007663	HANSON007674	Jan. 5, 2023 OKP Google Documents	<i>Objection: irrelevant, lack of foundation, hearsay</i>
47	Hanson_Defendants_075342	Hanson_Defendants_075343	Jan. 10, 2023 Email Exchange b/w Knieling & Hanson RE: Rule 27 training and accommodation process	No objection
48	HANSON008752	HANSON008753	ADA Employee Accommodation Request form	No objection (same as Exh. 203)
49	Hanson_Defendants_081798	Hanson_Defendants_081798	Notes from meeting b/w Hanson and Pham	<i>Objection: irrelevant, lack of foundation,</i>

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Exhibit No.	Bates Begin	Bates End	Description	Objections
				<i>hearsay</i>
50	Hanson_Defendants_081839	Hanson_Defendants_081853	Feb. 24, 2023 OKP Staff Meeting Notes	<i>Objection: irrelevant (notes come from after plaintiff's termination and are not about her), lack of foundation, hearsay</i>
51	Hanson_Defendants_075730	Hanson_Defendants_075532 HANSON008057	Jan. 25, 2023 Email from Pham RE: Separation memo	No objection (same as Exh. 267)
52	Hanson_Defendants_075533	Hanson_Defendants_075534	Mar. 20, 2023 Email from Pham to Knieling & Sanders RE: Laura Hanson – legal hold	No objection
53	Hanson_Defendants_001049	Hanson_Defendants_001086	July 2, 2020 Final Investigation Report by Brenda Baumgart	<i>Objection: this exhibit is a duplicate of itself (19 pp. without redactions, 19 pp. with) and of Exh. 270. No objection to first 19 pp.</i>
54	Hanson_Defendants_001236	Hanson_Defendants_001240	Sept. 23, 2020 Addendum to Final Investigation Report by Brenda Baumgart	No objection
55	HANSON008052	HANSON008055	Jan. 1, 2021 Khanh Pham Legislative Assistant Position Description	<i>Objeciton: lack of foundation</i>
56	HANSON007704	HANSON007707	Dec. 23, 2022 email from Pham to Hanson RE: following up!	<i>Objection: lack of foundation, hearsay, irrelevant</i>
57-107			Impeachment Exhibits	<i>Objections reserved</i>

DATED April 18, 2024.

Respectfully submitted,

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s/ Marc Abrams

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